REMARKS/ARGUMENTS

At present, applicants' Claims 1-2 stand rejected under 35 U.S.C. § 102 based upon the patent to Pong et al. (U.S. Patent No. 6,516,343 issued February 4, 2003, based upon an application originally filed on April 24, 2000). In light of the comments below, this rejection is most strenuously traversed.

Preliminarily, it is noted that applicants are submitting herewith an affidavit under 37 C.F.R. § 1.131 in which it is shown that the present applicants have in fact reduced their invention to practice prior to the filing date of the subject patent to Pong et al. This affidavit was not previously submitted since the examiner's logic and arguments in support of the rejection under 35 U.S.C. § 102 and the contents of the patent to Pong et al. made this submission unnecessary. However, it is noted that the submission of this affidavit at this time is not, however, in any way being characterized as being in any way necessary. In particular, while applicants assert that the patent to Pong et al. is no longer applicable prior art under 37 C.F.R. § 1.31, it is also noted that applicants very strenuously disagree with the examiner's comments and the rejection. Accordingly, for the reasons based upon the submitted affidavit and for reasons based upon the arguments presented below, it is alleged that the subject rejection is erroneous, and it is therefore respectfully requested that it be withdrawn.

The examiner's arguments are unfounded for several reasons. Not the least of these reasons is that the examiner has erroneously and improperly equated the function of a control unit with the function of an adapter. An adapter is a communications device; a control unit is a control device. The examiner's characterization of these two different devices as being identical is improper. There is

no foundation within applicants' specification or even within the patent to Pong et al. which would allow one of ordinary skill in the art to conclude that these two devices have similar structure, function, or operation. In sum, a control unit is not an adapter.

Since the patent to Pong et al. refers only to control units and not to adapters, it is clear that there is no adapter present in the patent to Pong et al. and since applicants' claims specifically recite the presence of an adapter, it is clear that the rejection cannot be sustained under 35 U.S.C. § 102 which requires an identity of all the claim elements to be found within the four corners of a single cited document. Accordingly, for this reason alone, the rejection of applicants' Claims 1-2 should be withdrawn.

There is yet at least one other very significant reason for the withdrawal of the rejection. In this regard, the examiner's attention is drawn to the paragraph spanning pages 3 and 4 of the above-identified office action. In this paragraph, the examiner refers to applicants' arguments in which applicants have stated that ". . . [In] the process recited to Pong et al., the destination address is determined at the transmission end of a request. In contrast in applicant's [sic] claimed process the destination address is determined at the destination end of the process." [Emphasis added in the current response.] The examiner responds to applicants' argument in the following way: "It is noted that nowhere in the claim language does it specify that the destination address is not determined until the end of the process or in other words at the destination . . .". In this respect, the examiner has completely misconstrued and misinterpreted applicants' statements. Nowhere have applicants indicated that the destination address is determined at the end of the process. Rather, it is to be specifically noted that it is applicants' assertion that, in the claimed process, the destination address is determined at the destination end of the process. In this regard,

the examiner's attention is specifically directed to applicants' step 3 which recites: "transferring, from said second data processing system to said adapter, real address information indicating desired target memory location for said message." This recitation specifically indicates that a real address indicating the location of target memory locations for the transmitted message is transferred from the second data processing system to the adapter. It is unequivocally clear that this information, namely, real address destination information, comes from the second data processor. It is absolutely clear that this information comes at the destination end of the process. Applicants are not asserting that it comes at the temporal end of the process, but rather, applicants are only asserting as specifically set out in applicants' claims that it comes from the recited destination rather than from the source end as is required by Pong et al.

In absolute and utter contrast, it is seen that it is the specific teaching of Pong et al. that the destination address comes from the source side of the transmission, not from the destination side. Accordingly, it is seen that the teachings of Pong et al. are in fact completely and absolutely opposite in this respect to the teachings found in applicants' specification and claims. Accordingly, it is seen that applicants' claim step 3 recites method operations which are nowhere taught, disclosed, or even remotely suggested by Pong et al. Accordingly, it is therefore respectfully requested that the rejection of applicants' Claims 1-2 based upon the patent to Pong et al. be withdrawn.

It is noted that this response is being submitted within two months of the final rejection. Accordingly, applicants request an Advisory Action to be submitted no later than March 29, 2004.

Accordingly, it is now seen that all of the applicants' claims are in condition for allowance. Therefore, early notification of the allowability of applicants' claims is earnestly solicited. Furthermore, if there are any matters which the Examiner feels could be expeditiously considered and which would forward the prosecution of the instant application, applicants' attorney wishes to indicate his willingness to engage in any telephonic communication in furtherance of this objective. Accordingly, applicants' attorney may be reached for this purpose at the numbers provided below.

Respectfully Submitted,

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Date

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